UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 05-CV-10907-MEL

LAUREN McSHANE, as ADMINISTRATRIX of the   )
 ESTATE OF ANTHONY MARCHETTI,   )
    Plaintiff   )
)
VS.   )
)
CHRISTINE CALLAHAN; OTHER UNKNOWN   )
NORFOLK COUNTY CORRECTIONAL OFFICERS;   )
and MICHAEL G. BELLOTTI IN HIS CAPACITY AS   )
NORFOLK COUNTY SHERIFF; and   )
PETER H. COLLINS, JOHN M. GILLIS, and   )
FRANCIS W. O'BRIEN, IN THEIR CAPACITY AS   )
NORFOLK COUNTY COMMISSIONERS   )

MOTION OF THE DEFENDANT, MICHAEL G. BELLOTTI, IN HIS CAPACITY AS NORFOLK COUNTY SHERIFF, TO COMPEL ANSWERS TO INTERROGATORIES AND RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS BY THE PLAINTIFF, LAUREN MCSHANE, ADMINISTRATRIX

Now comes the Defendant, Michael G. Bellotti, in his Capacity as Norfolk County Sheriff, and moves this Honorable Court to order the Plaintiff, Lauren McShane, Administratrix of the Estate of Anthony Marchetti, to answer the Defendant's Interrogatories and respond to the Defendant's Request for Production of Documents.

In support of this Motion, the Defendant submits the attached Memorandum.

Wherefore, the Defendant moves that the Motion to Compel be allowed and that the Plaintiff be ordered to answer the Defendant's Interrogatories and respond to the Defendant's Request for Production of Documents within twenty (20) days.

Respectfully submitted,

/s/ Paul F. Wynn
Paul F. Wynn   BBO# 535820
WYNN & WYNN, P.C.
90 New State Highway
Raynham, MA 02767
(508) 823-4567

Dated: December 21, 2005

CERTIFICATION
The Defendant, through counsel, hereby certifies that the provisions of Rule 37.1 have been complied with.

Paul F. Wynn
Attorney for Defendant

CERTIFICATE OF SERVICE

I, Paul F. Wynn, hereby certify that on this date, December 21, 2005, I caused to be served the foregoing documents, by electronic notice, upon the following Counsel of record:

John H. Cunha, Esquire
Cunha & Holcomb, P.C.
One State Street, Suite 500
Boston, MA 02109-3507

/s/ Paul F. Wynn
Paul F. Wynn
Attorney for Defendant,
Michael G. Bellotti, in his Capacity
As Norfolk County Sheriff